



Your business
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

July 1, 2016

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2016 ETC Annual Report of Warwick Valley – NJ Telephone Company
Study Area Code 160135**

Dear Ms. Dortch:

On behalf of Warwick Valley – NJ Telephone Company (“Warwick”), JSI files the attached confidential version of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission’s rules.¹ Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is being filed this date via the FCC’s Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the Company’s Five-Year Service Quality Improvement Plan Progress Report required by Section 54.313.³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 rel. March 22, 2016 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.313.



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Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2016 ETC Annual Report of Warwick Valley – NJ Telephone Company
Study Area Code 160135
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Warwick Valley – NJ Telephone Company (the “Company”) hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,¹ withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment is an attachment to the Company’s annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).³
2. Pursuant to Section 54.313, Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan (“Progress Report”) which is contained in the attachment to the 2016 Report.⁴
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s Progress Report provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ 47 C.F.R. §§ 54.313.

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."⁵ The Company's Progress Report updates this information as well as provides maps and detailed information as to whether or not network improvement objectives were achieved at the wire center level. Accordingly, because the Company is a rate-of-return carrier, it must file Progress Reports which contain proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing

⁵ See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

Request for Confidentiality

Page 3

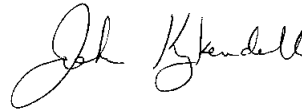
the attachment under seal. The Company uses the information contained in the Progress Report to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Progress Report provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

REDACTED FOR PUBLIC INSPECTION

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

| | | |
|-------|---|------------------------------|
| <010> | Study Area Code | 160135 |
| <015> | Study Area Name | WARWICK VALLEY-NJ |
| <020> | Program Year | 2017 |
| <030> | Contact Name: Person USAC should contact with questions about this data | Virginia O'Hanlon |
| <035> | Contact Telephone Number: Number of the person identified in data line <030> | 8459862535 ext. |
| <039> | Contact Email Address: Email of the person identified in data line <030> | vohanlon@momentumtelecom.com |
| | Form Type | 54.313 and 54.422 |

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

| | | |
|-------|---|------------------------------|
| <010> | Study Area Code | 160135 |
| <015> | Study Area Name | WARWICK VALLEY-NJ |
| <020> | Program Year | 2017 |
| <030> | Contact Name - Person USAC should contact regarding this data | Virginia O'Hanlon |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8459862535 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | vohanlon@momentumtelecom.com |

| | | | |
|-------|---|-------------|--|
| <110> | Has your company received its ETC certification from the FCC? | (yes / no) | <input type="radio"/> <input checked="" type="radio"/> |
| <111> | If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC? | (yes / no) | <input type="radio"/> <input type="radio"/> |

If your answer to Line <111> is yes, please file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

160135nj112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How much (USF) was used to improve service quality and how support was used to improve service quality
- <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
- <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

| |
|-----|
| No |
| Yes |
| No |
| No |
| No |
| No |

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<210> For the prior calendar year, were there any reportable voice service outages? No

**(300) Unfulfilled Service Request
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

| | | |
|-------|---|------------------------------|
| <010> | Study Area Code | 160135 |
| <015> | Study Area Name | WARWICK VALLEY-NJ |
| <020> | Program Year | 2017 |
| <030> | Contact Name - Person USAC should contact regarding this data | Virginia O'Hanlon |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8459862535 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | vohanlon@momentumtelecom.com |

<300> Unfulfilled service request (voice)

0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

0

<330> Detail on attempts (broadband)

Name of Attached Document

| | |
|--|--|
| (400) Number of Complaints per 1,000 customers Data Collection Form | FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
|--|--|

| | | |
|-------|---|------------------------------|
| <010> | Study Area Code | 160135 |
| <015> | Study Area Name | WARWICK VALLEY-NJ |
| <020> | Program Year | 2017 |
| <030> | Contact Name - Person USAC should contact regarding this data | Virginia O'Hanlon |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8459862535 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | vohanlon@momentumtelecom.com |
| <400> | Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice | |
| <410> | Complaints per 1000 customers for fixed voice | 0 . 0 |
| <420> | Complaints per 1000 customers for mobile voice | |
| <430> | Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband | |
| <440> | Complaints per 1000 customers for fixed broadband | 0 . 0 |
| <450> | Complaints per 1000 customers for mobile broadband | |

| | | |
|--|--|---|
| (500) Compliance With Service Quality Standards and Consumer Protection Rules | | FCC Form 481 |
| Data Collection Form | | OMB Control No. 3060-0986/OMB Control No. 3060-0819 |
| | | July 2013 |

| | | |
|-----------------|--|------------------------------|
| <010> | Study Area Code | 160135 |
| <015> | Study Area Name | WARWICK VALLEY-NJ |
| <020> | Program Year | 2017 |
| <030> | Contact Name - Person USAC should contact regarding this data | Virginia O'Hanlon |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8459862535 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | vohanlon@momentumtelecom.com |
| <500> | Certify compliance with applicable service quality standards and consumer protection rules | Yes |
| 160135nj510.pdf | | |
| <510> | Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance | |

| | | | |
|---|--|--------------------------------|--|
| (600) Functionality in Emergency Situations Data Collection Form | | REDACTED FOR PUBLIC INSPECTION | FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
|---|--|--------------------------------|--|

| | | |
|-------|---|------------------------------|
| <010> | Study Area Code | 160135 |
| <015> | Study Area Name | WARWICK VALLEY-NJ |
| <020> | Program Year | 2017 |
| <030> | Contact Name - Person USAC should contact regarding this data | Virginia O'Hanlon |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8459862535 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | vohanlon@momentumtelecom.com |
| <600> | Certify compliance regarding ability to function in emergency situations | Yes |
| <610> | Descriptive document for Functionality in Emergency Situations | 160135nj610.pdf |

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

| | | |
|-------|---|------------------------------|
| <010> | Study Area Code | 160135 |
| <015> | Study Area Name | WARWICK VALLEY-NJ |
| <020> | Program Year | 2017 |
| <030> | Contact Name - Person USAC should contact regarding this data | Virginia O'Hanlon |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8459862535 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | vohanlon@momentumtelecom.com |
| <810> | Reporting Carrier | Alteva of Warwick LLC |
| <811> | Holding Company | Alteva Inc. |
| <812> | Operating Company | Alteva of Warwick LLC |

[illegible]

**(900) Tribal Lands Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

| | | |
|-------|---|------------------------------|
| <010> | Study Area Code | 160135 |
| <015> | Study Area Name | WARWICK VALLEY-NJ |
| <020> | Program Year | 2017 |
| <030> | Contact Name - Person USAC should contact regarding this data | Virginia O'Hanlon |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8459862535 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | vohanlon@momentumtelecom.com |

<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

| Select Yes or No or Not Applicable |
|--|
| |
| |
| |
| |
| |
| |
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| |
| |
| |

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

| | | |
|-------|---|------------------------------|
| <010> | Study Area Code | 160135 |
| <015> | Study Area Name | WARWICK VALLEY-NJ |
| <020> | Program Year | 2017 |
| <030> | Contact Name - Person USAC should contact regarding this data | Virginia O'Hanlon |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8459862535 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | vohanlon@momentumtelecom.com |

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance

Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

| | |
|--|--|
| (1100) No Terrestrial Backhaul Reporting Data Collection Form | FCC Form 481 |
| | OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |

| | | |
|-------|---|------------------------------|
| <010> | Study Area Code | 160135 |
| <015> | Study Area Name | WARWICK VALLEY-NJ |
| <020> | Program Year | 2017 |
| <030> | Contact Name - Person USAC should contact regarding this data | Virginia O'Hanlon |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8459862535 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | vohanlon@momentumtelecom.com |

<1100> Certify whether terrestrial backhaul options exist (Y/N)

No

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

Yes

| | |
|--|--|
| (1200) Terms and Condition for Lifeline Customers Lifeline Data Collection Form | FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
|--|--|

| | | |
|-------|---|------------------------------|
| <010> | Study Area Code | 160135 |
| <015> | Study Area Name | WARWICK VALLEY-NJ |
| <020> | Program Year | 2017 |
| <030> | Contact Name - Person USAC should contact regarding this data | Virginia O'Hanlon |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8459862535 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | vohanlon@momentumtelecom.com |

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- | | |
|--|-------------------------------------|
| <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> Details on the number of minutes provided as part of the plan, | <input checked="" type="checkbox"/> |
| <1223> Additional charges for toll calls, and rates for each such plan. | <input checked="" type="checkbox"/> |

(2000) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

| | | |
|-------|---|------------------------------|
| <010> | Study Area Code | 160135 |
| <015> | Study Area Name | WARWICK VALLEY-NJ |
| <020> | Program Year | 2017 |
| <030> | Contact Name - Person USAC should contact regarding this data | Virginia O'Hanlon |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8459862535 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | vohanlon@momentumtelecom.com |

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

| | | | |
|---------|---|---|---|
| <2010> | 2nd Year Certification 47 CFR § 54.313(b)(1)(i) - Note that for the July 1 2016 certification, this applies to Round 2 recipients of Incremental Support | <div style="border: 1px solid black; height: 20px; width: 100%;"></div> | |
| <2011> | 3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1 2016 certification, this applies to Round 1 recipients of Incremental Support | <div style="border: 1px solid black; height: 20px; width: 100%;"></div> | |
| <2022> | Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only. | <div style="border: 1px solid black; height: 20px; width: 100%;"></div> | |
| <2023> | The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year two - 54.313(b)(2)(ii). Round 2 recipients only. | <div style="border: 1px solid black; height: 20px; width: 100%;"></div> | |
| <2024A> | Round 2 Recipient of Incremental Support? | <div style="border: 1px solid black; height: 20px; width: 100%;"></div> | <div style="border: 1px solid black; height: 60px; width: 100%;"></div> |
| <2024B> | Attach list of census blocks indicating where funding was spent in year two - 54.313(b)(2)(ii). Round 2 recipients only. | Name of Attached Document Listing Required Information | <div style="border: 1px solid black; height: 60px; width: 100%;"></div> |
| <2025A> | Round 1 or Round 2 Recipient of Incremental Support? | <div style="border: 1px solid black; height: 20px; width: 100%;"></div> | |
| <2025B> | Attach geocoded Information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13- | Name of Attached Document Listing Required Information | <div style="border: 1px solid black; height: 60px; width: 100%;"></div> |
| <2015> | 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4) | <div style="border: 1px solid black; height: 20px; width: 100%;"></div> | |

(2000) Price Cap Carrier Additional Documentation (Continued)

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017B> Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price

Name of Attached Document Listing
Required Information

cap carrier used for capital expenditures in 2015.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)

<2020> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)

<2021> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)

<2026> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)

<2027> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)

| | | |
|-------|---|------------------------------|
| <010> | Study Area Code | 160135 |
| <015> | Study Area Name | WARWICK VALLEY-NJ |
| <020> | Program Year | 2017 |
| <030> | Contact Name - Person USAC should contact regarding this data | Virginia O'Hanlon |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8459862535 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | vohanlon@momentumtelecom.com |

Complete the items below to note compliance with five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

| | | | |
|---------|--|--|--|
| (3009) | Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii) | | |
| (3010A) | Milestone Certification {47 CFR § 54.313(f)(1)(i)} | Yes - Attach Certification | |
| (3010B) | Please Provide Attachment | Name of Attached Document Listing Required Information | 160135nj3010.pdf |
| (3012A) | Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)} | No - No New Community Anchors | |
| (3012B) | Please Provide Attachment | Name of Attached Document Listing Required Information | |
| (3013) | Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)} | (Yes/No) | <input type="radio"/> <input checked="" type="radio"/> |
| (3014) | If yes, does your company file the RUS annual report | (Yes/No) | <input type="radio"/> <input type="radio"/> |
| (3015) | Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires: Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) | | <input type="checkbox"/> |
| (3016) | Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows | | <input type="checkbox"/> |
| (3017) | If the response is yes on line 3014, attach your company's RUS annual report and all required documentation | Name of Attached Document Listing Required Information | |
| (3018) | If the response is no on line 3014, is your company audited? | (Yes/No) | <input type="radio"/> <input type="radio"/> |
| (3019) | If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers | | <input type="checkbox"/> |
| (3020) | Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows | | <input type="checkbox"/> |
| (3021) | Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit. | | <input type="checkbox"/> |
| (3022) | If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers | | <input type="checkbox"/> |
| (3023) | Underlying information subjected to a review by an independent certified public accountant | | <input type="checkbox"/> |
| (3024) | Underlying information subjected to an officer certification. | | <input type="checkbox"/> |
| (3025) | Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows | | <input type="checkbox"/> |
| (3026) | Attach the worksheet listing required information | Name of Attached Document Listing Required Information | |

REDACTED FOR PUBLIC INSPECTION

(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

| | | |
|-------|---|------------------------------|
| <010> | Study Area Code | 160135 |
| <015> | Study Area Name | WARWICK VALLEY-NJ |
| <020> | Program Year | 2017 |
| <030> | Contact Name - Person USAC should contact regarding this data | Virginia O'Hanlon |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8459862535 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | vohanlon@momentumtelecom.com |

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

| | |
|--|---|
| (4005) Rural Broadband Experiment Additional Documentation Data Collection Form | FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
|--|---|

| | | |
|-------|---|------------------------------|
| <010> | Study Area Code | 160135 |
| <015> | Study Area Name | WARWICK VALLEY-NJ |
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| <030> | Contact Name - Person USAC should contact regarding this data | Virginia O'Hanlon |
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| <039> | Contact Email Address - Email Address of person identified in data line <030> | vohanlon@momentumtelecom.com |

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

| | | |
|---|--|--|
| 4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year. | Name of Attached Document Listing Required Information | |
|---|--|--|

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

| | | |
|--|--|--|
| 4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481. | Name of Attached Document Listing Required Information | |
|--|--|--|

| | | |
|--|--|--|
| 4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area. | Name of Attached Document Listing Required Information | |
|--|--|--|

| | |
|---|--|
| Certification - Reporting Carrier Data Collection Form | FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
|---|--|

| | |
|---|------------------------------|
| <010> Study Area Code | 160135 |
| <015> Study Area Name | WARWICK VALLEY-NJ |
| <020> Program Year | 2017 |
| <030> Contact Name - Person USAC should contact regarding this data | Virginia O'Hanlon |
| <035> Contact Telephone Number - Number of person identified in data line <030> | 8459862535 ext. |
| <039> Contact Email Address - Email Address of person identified in data line <030> | vohanlon@momentumtelecom.com |

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

| | |
|---|--------------------------------|
| Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients | |
| I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate. | |
| Name of Reporting Carrier: | |
| Signature of Authorized Officer: | Date |
| Printed name of Authorized Officer: | |
| Title or position of Authorized Officer: | |
| Telephone number of Authorized Officer: | |
| Study Area Code of Reporting Carrier: | Filing Due Date for this form: |
| Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001. | |

| | |
|---|--|
| Certification - Agent / Carrier Data Collection Form | FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
|---|--|

| | |
|---|------------------------------|
| <010> Study Area Code | 160135 |
| <015> Study Area Name | WARWICK VALLEY-NJ |
| <020> Program Year | 2017 |
| <030> Contact Name - Person USAC should contact regarding this data | Virginia O'Hanlon |
| <035> Contact Telephone Number - Number of person identified in data line <030> | 8459862535 ext. |
| <039> Contact Email Address - Email Address of person identified in data line <030> | vohanlon@momentumtelecom.com |

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

| Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier | |
|---|--|
| I certify that (Name of Agent) <u>JSI</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate. | |
| Name of Authorized Agent: | <u>JSI</u> |
| Name of Reporting Carrier: | <u>WARWICK VALLEY-NJ</u> |
| Signature of Authorized Officer: | Date: |
| Printed name of Authorized Officer: | |
| Title or position of Authorized Officer: | |
| Telephone number of Authorized Officer: | |
| Study Area Code of Reporting Carrier: | <u>160135</u> Filing Due Date for this form: <u>07/01/2016</u> |
| Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001. | |

TO BE COMPLETED BY THE AUTHORIZED AGENT:

| Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier | |
|--|--|
| I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate. | |
| Name of Reporting Carrier: | <u>WARWICK VALLEY-NJ</u> |
| Name of Authorized Agent Firm: | <u>JSI</u> |
| Signature of Authorized Agent or Employee of Agent: | Date: <u>06/30/2016</u> |
| Name of Authorized Agent Employee: | <u>Olivia D. Hill</u> |
| Title or position of Authorized Agent or Employee of Agent | <u>Sr. Regulatory Analyst</u> |
| Telephone number of Authorized Agent or Employee of Agent: | <u>3014597590 ext. 210</u> |
| Study Area Code of Reporting Carrier: | <u>160135</u> Filing Due Date for this form: <u>07/01/2016</u> |
| Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001. | |

Attachments

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 112

**Five-Year Network Improvement Plan and
Progress Report**

ATTACHMENT REDACTED IN ENTIRETY

REDACTED FOR PUBLIC INSPECTION

**(700) Price Offerings including Voice Rate Data
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

| | | |
|-------|---|------------------------------|
| <010> | Study Area Code | 160135 |
| <015> | Study Area Name | WARWICK VALLEY-NJ |
| <020> | Program Year | 2017 |
| <030> | Contact Name - Person USAC should contact regarding this data | Virginia O'Hanlon |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8459862535 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | vohanlon@momentumtelecom.com |

| | | |
|-------|--|----------|
| <701> | Residential Local Service Charge Effective Date | 1/1/2016 |
| <702> | Single State-wide Residential Local Service Charge | 12.8 |

<703>

[illegible]

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

| | | |
|-------|---|------------------------------|
| <010> | Study Area Code | 160135 |
| <015> | Study Area Name | WARWICK VALLEY-NJ |
| <020> | Program Year | 2017 |
| <030> | Contact Name - Person USAC should contact regarding this data | Virginia O'Hanlon |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8459862535 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | vohanlon@momentumtelecom.com |

| <711> | <a1> | <a2> | <b1> | <b2> | <c> | <d1> | <d2> | <d3> | <d4> |
|-------|-------|-----------------------|------------------|----------------------|----------------------|---|---|----------------------|--|
| | State | Exchange (ILEC) | Residential Rate | State Regulated Fees | Total Rates and Fees | Broadband Service - Download Speed (Mbps) | Broadband Service - Upload Speed (Mbps) | Usage Allowance (GB) | Usage Allowance Action Taken When Limit Reached {select} |
| | NJ | Vernon/Highland Lakes | 35.95 | 0.0 | 35.95 | 15.0 | 0.78 | 0.0 | Other, None |
| | NJ | Vernon/Highland Lakes | 44.85 | 0.0 | 44.85 | 30.0 | 0.78 | 0.0 | Other, None |
| | NJ | Vernon/Highland Lakes | 39.95 | 0.0 | 39.95 | 15.0 | 0.78 | 0.0 | Other, None |
| | NJ | Vernon/Highland Lakes | 49.95 | 0.0 | 49.95 | 30.0 | 0.78 | 0.0 | Other, None |
| | NJ | Upper Greenwood Lake | 35.95 | 0.0 | 35.95 | 15.0 | 0.78 | 0.0 | Other, None |
| | NJ | Upper Greenwood Lake | 44.85 | 0.0 | 44.85 | 30.0 | 0.78 | 0.0 | Other, None |
| | NJ | Upper Greenwood Lake | 39.95 | 0.0 | 39.95 | 15.0 | 0.78 | 0.0 | Other, None |
| | NJ | Upper Greenwood Lake | 49.95 | 0.0 | 49.95 | 30.0 | 0.78 | 0.0 | Other, None |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
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REDACTED FOR PUBLIC INSPECTION

| | |
|---------------------------|---|
| (800) Operating Companies | FCC Form 481 |
| Data Collection Form | OMB Control No. 3060-0986/OMB Control No. 3060-0819 |
| | July 2013 |

| | | |
|-------|---|------------------------------|
| <010> | Study Area Code | 160135 |
| <015> | Study Area Name | WARWICK VALLEY-NJ |
| <020> | Program Year | 2017 |
| <030> | Contact Name - Person USAC should contact regarding this data | Virginia O'Hanlon |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 8459862535 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | vohanlon@momentumtelecom.com |
| <810> | Reporting Carrier | Alteva of Warwick LLC |
| <811> | Holding Company | Alteva Inc. |
| <812> | Operating Company | Alteva of Warwick LLC |

[illegible]

Alteva of Warwick LLC

Service Quality Standards & Consumer Protection Rules Compliance

FCC Form 481, Line 510

Alteva of Warwick LLC complies with applicable service quality standards and consumer protections by (1) filing local service tariffs with the NJBPU and making rate and service information available to the public upon request; (2) clearly listing all charges and credits on customers' bills; (3) providing full and prompt investigation of, and response to, customer complaints; (4) providing access to enhanced 911 emergency report centers; (5) participating in statewide system for the hearing impaired; (6) complying with federal CPNI rules and other applicable consumer privacy protection requirements, including training of employees that have access to CPNI on the rules and procedures for protecting account information and authenticating callers; and (7) implementing procedures that are consistent with the FTC's guidance on measures to detect/prevent identity theft (Red Flag).

In addition, the company complies with applicable consumer protections identified in 47 C.F.R. Part 8 for its broadband internet services including, but not limited to, §8.3, §8.5 and §8.7 addressing transparency, blocking and discrimination protections, respectively.

Alteva of Warwick LLC

**Functionality in Emergency Situations
FCC Form 481, Line 610**

All of the company's facilities feature battery backup systems to prevent load drop events when street power is lost. Our systems are remote monitored 24/7 for such events. Upon an event being detected, a technician is dispatched to either confirm good working order of the generator services at the CO and/or Remote, or to deploy a portable generator for continued off grid operation.

In the event the company suffers a traffic overload, we receive alerts of trunk saturation and will reroute traffic where possible to alleviate such issues.

In the event of a physical failure, the main CO/Remotes are configured in multiple self-healing rings. This allows traffic to route between locations if an intermediate link between locations is lost around the remaining facilities.

In addition to supporting its voice network, the company's emergency generators and/or batteries would also be used to support its broadband network in the event of an extended power outage.

Company complies with the FCC's backup power requirements, effective October 16, 2015.

Warwick Valley Telephone Company

Section 10
 Original Page No.
 First Revised Page No. 9B
 Replacing Original Page No. 9B

LOCAL EXCHANGE, TOLL RATES AND ZONE AREAS TARIFF RATES

LIFELINE TELEPHONE SERVICE

A. DESCRIPTION

Lifeline Discounted Service

This service provides a credit against Local Service monthly rate (representing Federal Lifeline Support) of \$3.50 less the amount applied against the Federal Subscriber Line Charge. Lifeline Service is limited to one line per qualified customer. A Lifeline Service customer may not subscribe to any other type of Residence Local Exchange Service at the same premise or at another premise. Lifeline Service will not be provided using Foreign Exchange Service or Foreign Central Office Service.

**
*

B. GENERAL

Qualified customers may choose the Lifeline service as described. Message rate Lifeline is available only where central office facilities permit. For connection of new service, service connection charges apply unless the customer qualifies for connection assistance under the Link Up America Plan.

Service connection charges do not apply to change existing service from:

1. Message or flat rate services to Lifeline service;
2. Lifeline service to non-Lifeline message or flat rate services.

Issued- October 20, 1997
 By: Fred M. Knipp, President
 47 Main Street
 Warwick, New York 10990

Effective- November 10, 1997
 Filed Pursuant to an Order of the
 Board of Public Utilities
 Dated- Docket No

Warwick Valley Telephone Company

Section 10
Original Page No.
Second Revised Page No. 9C
Replacing First Revised Page No. 9C

LOCAL EXCHANGE, TOLL RATES AND ZONE AREAS TARIFF RATES

LIFELINE TELEPHONE SERVICE (cont'd)

C. REGULATIONS

a. These services are restricted to low income residential customers. To qualify for Lifeline service a customer must be certified as income eligible or a recipient of benefits from any one of the following Entitlement Programs administered by the State of New Jersey or the Federal Government:

1. Supplemental Security Income/Medicaid **
2. Temporary Assistance to Needy Families/Work First New Jersey *
3. General Assistance
4. Lifeline Utility Credit/Tenants Lifeline Assistance
5. Pharmaceutical Assistance to the Aged and Disabled
6. Food Stamp Program *
7. Home Energy Assistance Program (HEAP) **

b. Applicants must provide proof to the Company that they are certified as eligible to receive, currently receiving, or have received during the past year, one or more of the above benefits. Lifeline rate treatment will not begin until proof of eligibility is provided to the Company. A qualifying consumer must agree to notify the Company if that consumer ceases to participate in the above program or programs.

The lifeline discount is effective upon receipt of a completed form of eligibility. If the form is not returned, no further action is taken by the Company to establish eligibility.

c. The Company, in coordination with appropriate agencies, will make periodic verification of the customer's eligibility status. If, after verification, a customer is identified as being ineligible, the customer will be notified that unless the information is shown to be in error, the Lifeline discount will be discontinued. The customer will be billed for discounts received for the time that they were proven to be ineligible for the service.

Issued- October 20, 1997
By: Fred M. Knipp, President
47 Main Street
Warwick, New York 10990

Effective- November 10, 1997
Filed Pursuant to an Order of the
Board of Public Utilities
Dated- Docket No.

Warwick Valley Telephone Company

Section 10

Original Page No. 9D

First Revised Page No.

Replacing Page No.

LOCAL EXCHANGE, TOLL RATES AND ZONE AREAS TARIFF RATES

LIFELINE TELEPHONE SERVICE (cont'd)

C. REGULATIONS

d. All past due balances and service restrictions will continue to apply to existing customers who qualify for Lifeline Service. Service restrictions will remain until the past due amount(s) have been paid in full.

e. Any Lifeline Service customer who has a past due balance of \$20.00 or more in toll messages charges will be automatically restricted from access to toll services until the outstanding balance is paid. The Restoral of Service Charge applies to Lifeline customers whose message toll service has been restricted for non-payment.

f. A Lifeline Service line will be blocked from access to 700,900,976, and all other Announcement Services.

g. Optional services available with Lifeline Service are limited to a Non-published listing, Call Block, Caller ID, and Call Trace.

h. The monthly credit in Section B.8. does not apply.

i. As part of Lifeline Service, toll blocking will be made available, if requested by the customer at no additional charge.

Issued- October 20, 1997
By: Fred M. Knipp, President
47 Main Street
Warwick, New York 10990

Effective- November 10, 1997
Filed Pursuant to an Order of the
Board of Public Utilities
Dated- Docket No.

Alteva of Warwick LLC (SAC 160135)

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

Alteva of Warwick LLC hereby certifies that throughout 2015, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, and offering broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream is reasonable, the Company offers broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream.